# IN THE UNITED STATES DISTRICT COURT
# DISTRICT OF SOUTH CAROLINA

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| Stephen Andrew Beckham, #236548,<br>*Aka* Stephen A. Beckham,<br><br>Petitioner,<br>v.<br><br>Leroy Cartledge, McCormick Correctional Institution,<br>Respondent. | C/A No. 6:14-4358-MGL-KFM<br><br><br><br>**MOTION TO ENLARGE** |

The Respondent, above-named, by and through the undersigned attorneys, would respectfully move this Court for a second extension of time within which to make return or otherwise plead for two weeks up to March 26, 2015. The response of Respondent in the above action is due to be filed March 12, 2015. The undersigned attorneys for the above Respondent move that the time for return be extended for two weeks until to March 26, 2015. The Respondent has consulted with opposing counsel Elizabeth Franklin-Best this date who has no objection to the request. This motion is made because the Respondent has not been able to respond within the allotted time for the following reasons, primarily concerning redaction of the thirty–two (32) volume appellate record including review of juror information and juvenile witnesses and names consistent this Court’s redaction policy. Respondent has also determined that over 30 individual pages of the Supplemental Record (trial transcript) in Respondent’s possession are either missing or partially obliterated and seeking to determine if those pages are otherwise available to be included at the time of the filing of the Return :

1. Counsel is actively preparing the Return in the matter and believe that no further extensions will be necessary absent extraordinary circumstances.
2. Counsel for the undersigned has had a number of other commitments in State and

Federal court that have precluded timely completion of the Return. In the last month, below-signed counsel below-signed counsel assisted in a Petition for Writ of Certiorari filed in the U.S. Supreme Court on February 9, 2015 in Aiken et. al. v. Byars ; on February 9, 2015 made a Response to a Status Report in the federal habeas matter of Joshua Jeter v. Warden; on February 11, 2015 filed a Brief of Respondent in the South Carolina Court of Appeals in Herman L. Hughes v. State, on February 13, 2015 filed a Response to Petition for Court Oversight of Capital PCR Action in the South Carolina Supreme Court in Stephen Stanko v. State; on February 17, 2015 filed a Return and Motion for Sanctions in Christopher Lane v. South Carolina in the original jurisdiction of the South Carolina Supreme Court; on February 19, 2015 filed a return and memorandum in the federal habeas corpus matter of Michael Anthony Allen v. Warden; on February 23, 2015 filed a Response to a petition for rehearing in State v. Jaquwn Brewer in the South Carolina; and on February 23, 2015 filed a response to a Motion for discovery in Bayan Aleksey v. Warden; made a response concerning deficiencies in the record on appeal in Antonio Gordon v. Warden; made a court-ordered return in the federal habeas matter of Kimjaro Presley v. Warden on February 27, 2015; made a Return to Motion for Extraordinary Relief to the Supreme Court in Marion Lindsey v. State filed March 2, 2015, traveled to Conway S.C. and prepared and handled the death penalty PCR hearing in Stephen Stanko v. State before Judge Culbertson on March 2-3, 2015. Until March 11, 2015, below-signed counsel was also actively preparing for depositions on March 12 and a merit hearing on April 27, 2015 in the Stephen Stanko v. State PCR action related to the Georgetown convictions, but due to an intervening issue on March 11 is no longer directly involved in the handling of the matter other than through supervision. Respondent has been actively working on the Return in Stephen Beckham for the federal habeas action.

3. Respondents have a Return due on March 19, 2015 in the South Carolina Supreme Court in Sammie Stokes v. State, a death penalty PCR appeal on certiorari; a petition for rehearing in State v. Keith Letmon on March 19; and a petition for rehearing in State v. Tavario Brunson on March 19 prior to the requested due date for the Return in this matter on March 26.

4. The attorneys for the Respondent have not been able, in a timely fashion, to collect all of the records, prepare necessary copies, gather information, and redact the extensive appendix and supplemental appendix for filing in this Court. The state court post-conviction relief appellate record consists of a ten (10) volume Appendix (3594 pages) and a twenty-three (23) volume Supplemental Appendix (5738 pages) that is being reviewed for redaction consisted with this Court redaction policy.

WHEREFORE, Respondent requests the extension until March 26, 2015 to file the Return and appropriate attachments.

Respectfully submitted,

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By: ________________________
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March 12, 2015